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7 **UNITED STATES DISTRICT COURT**
8 **CENTRAL DISTRICT OF CALIFORNIA**
9 **WESTERN DIVISION**

10 CENTER FOR BIOLOGICAL
11 DIVERSITY, et al.,

12 *Plaintiffs,*

13 v.
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15 DOUG BURGUM, et al.,

16 *Defendants,*

17 SABLE OFFSHORE CORP.,
18

19 *Intervenor-Defendant.*
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Case No. 2:24-cv-05459-MWC-MAA

**DECLARATION OF
MATI WAIYA**

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22 I, Mati Waiya, hereby declare as follows,

23 1. I have personal knowledge of the statements in this declaration and, if
24 called as a witness, I could and would competently testify to these matters under
25 oath. Statements expressing an opinion reflect my own personal view and
26 judgment on the matter.
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1 2. I am a Chumash Ceremonial Elder from the Chumash Mishkanaka
2 Clan, also known as the Turtle Clan. I am also the elected Chairman of the Coastal
3 Band of the Chumash Nation.

4 3. I founded the Wishtoyo Foundation in 1997 with two main goals:
5 (1) to preserve and protect Chumash culture, the culture of all first nations peoples,
6 and natural resources essential for everyone, and (2) to educate and instill in youth
7 environmental values, awareness, and stewardship. I have served as the Executive
8 Director of Wishtoyo since founding it. My responsibilities include directing the
9 organization's activities and operations.

10 4. Wishtoyo is a nonprofit corporation organized under the laws of
11 California with over 200 sustaining members. Our headquarters and primary
12 meeting places are the Wishotyo Chumash Village in Malibu and our Saticoy office
13 in Ventura.

14 5. Wishtoyo's mission is to protect and preserve Chumash culture, the
15 culture of all indigenous peoples, and the natural resources upon which all people
16 depend.

17 6. Wishtoyo has a long record of working to protect and restore the Santa
18 Barbara Channel, Pacific Ocean, and our beaches and shores. For example, we
19 have brought numerous federal Clean Water Act cases in Los Angeles and Ventura
20 counties to protect the ocean, its marine life, and its cultural resources from
21 pollution. We have advocated in state and federal forums for adequate protections
22 to prevent future oil spills along the Gaviota Coast, Santa Barbara Channel, and
23 inland and coastal waters. We were involved in the Marine Life Protection Act
24 initiative in several ways, including helping establish Marine Protected Areas in
25 the Santa Barbara Channel, Malibu area, and throughout the South Coast Region;
26 publishing a white paper on the importance of implementing tribal co-management
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1 components to protect ecological and cultural values; and running the Chumash
2 Tribal Marine Protected Area education program for K-12 students. Wishtoyo also
3 provides a program to certify participants under the California Naturalist Program
4 with a focus on indigenous traditional knowledge and marine science, and we host
5 annual coastal cleanup days at various locations. In one of the organization's most
6 important annual events, we partner with other groups and community members to
7 organize an ocean voyage to Limu, which is Chumash homeland and part of the
8 Channel Islands, using a traditional Chumash planked canoe called a tomol.

9 7. The Pacific and marine animals are an integral part of Chumash
10 culture. Numerous Chumash ceremonial practices rely on the presence of native
11 wildlife, including dolphins, whales, sea lions, sea turtles, sea otters, pelicans, and
12 black abalone. Dolphins are particularly revered in Chumash culture, considered to
13 be our brothers and sisters through our oral traditions and teachings.

14 8. The decisions to extend oil and gas leases and to issue permits to
15 restart and enhance production in the Santa Ynez Unit has direct, severe
16 implications for Wishtoyo's interests—putting sensitive ecosystems, marine
17 animals, and the Chumash people's cultural resources at great risk of harm from air
18 pollution, water pollution, oil leaks and spills. The 2015 Refugio oil spill is a tragic
19 example of this fact, showing just how devastating a major oil spill can be to our
20 coastal environment and Chumash people. The spill, which dumped more than
21 450,000 gallons of oil into the ocean, killed hundreds of marine animals, including
22 dozens and dozens of dolphins. We mourned the loss of each one—feeling their
23 death like the passing of our spiritual relatives. Additionally, given the
24 contaminated ocean, beaches, and shorelines, we could not gather coastal resources
25 for food, cultural practices, or ceremonies for an extended time. The spill also
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1 prevented us from holding our annual tomol voyage across the Santa Barbara
2 Channel to Limu and the tomol village visits up and down the coast.

3 9. Wishtoyo works to ensure a traumatic event like the 2015 Refugio
4 disaster is never repeated, but the lease extensions and permits at issue in this case
5 make it much more likely another oil spill will occur—causing long-lasting,
6 catastrophic impacts. Offshore drilling from these old, decaying oil rigs increases
7 the risk of spills with each passing day. The fact there was no environmental or
8 cultural review of the impacts makes these matters worse still.

9 10. Restarting oil drilling in the Santa Ynez Unit will harm the landscape
10 of the Pacific Ocean and Santa Barbara Channel and disrupt the cultural systems
11 and understandings essential for Chumash lifeways. The longer this oil drilling
12 remains in the ocean and the longer drilling continues, the longer we will have our
13 views of the Santa Barbara Channel ruined by these drilling platforms, lights, and
14 ships. Our health and wellbeing will continue to be at risk when taking a tomol out
15 for our annual tomol voyage, which starts at 3:00 am, unable to experience the
16 ocean waters without fear of being hit by vessels connected to drilling operations.
17 We will not be able to connect with our ancestors while watching dolphins and
18 whales from the beach, because we will see oil production operations and know the
19 death associated with them. The lease extensions and drilling permits for the Santa
20 Ynez Unit therefore harm the natural and cultural resources on which we rely, and
21 those on which I rely as a Chumash ceremonial elder.

22 11. Wishtoyo's interests would be protected by the relief requested in this
23 lawsuit because the Court could require the federal government to carefully
24 consider the impacts of its decision on Chumash tribes, bands, and clans that have
25 a long history of interaction with the marine waters of the Pacific Ocean and the
26 Santa Barbara Channel, from Point Conception to Malibu and out to and around
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1 the Channel Islands, and we rely on these waters and their natural resources to
2 support and maintain Chumash traditional practices, ways of life, and ancestral
3 connections. Chumash people and Wishtoyo have a strong cultural interest in the
4 protection of these coastal resources. We use the Pacific Ocean, Santa Barbara
5 Channel, Channel Islands, and surrounding beaches and shorelines for ceremonial
6 and educational purposes, to connect with and celebrate our ancestors and cultural
7 heritage, and to gather natural cultural resources.

8 12. My interests would also be protected because I personally rely on the
9 Pacific Ocean, Santa Barbara Channel, and Channel Islands to maintain my
10 traditional practices and lifeways. I gather and will continue to gather shells,
11 pelican bones, and other marine life for cultural practices. I participate and will
12 continue to participate in the annual tomol voyage to Limu, and I find great pride
13 and pleasure in knowing our Chumash brothers and sisters can navigate traditional
14 tomols across the Santa Barbara Channel and visit our native homelands. I also
15 enjoy and will always enjoy viewing dolphins and other marine species living in
16 the Santa Barbara Channel, because they remind me of my ancestors and connect
17 me to my Chumash culture. Knowing the remains of ancient villages and resting
18 places of our Chumash ancestors are not at risk of water and air pollution and harm
19 from oil spills and leaks would bring me peace.

20 13. Taking action to stop the harms to the Pacific Ocean and the Santa
21 Barbara Channel caused by these federal lease extensions, permits, and lack of
22 environmental review will help Wishtoyo's mission of defending the Pacific
23 Ocean, its marine species, and cultural resources for the benefit of coastal
24 communities and Chumash culture. We have to prevent the damage caused by
25 these actions to make sure oil and gas drilling at the Santa Ynez Unit does not
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1 harm my cultural and ceremonial practices as well as my enjoyment of the Pacific
2 Ocean and healthy marine animals and ecosystems.

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4 I declare under penalty of perjury that the foregoing is true and correct.

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6 Executed on May 1, 2025

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10 Mati Waiya
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